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7 UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF WASHINGTON

9 AMANDA BANTA, *et al.*,

10 Plaintiffs,

11 v.

12 ROBERT W. FERGUSON, *et al.*,

13 Defendants.
14
15
16

No. 2:23-cv-00112-MKD

DECLARATION OF KAI A.
SMITH IN SUPPORT OF
MOTION TO INTERVENE

NOTED ON MOTION
CALENDAR:
June 12, 2023
Without Oral Argument

17 1. I am a partner at Pacifica Law Group LLP, and attorney of record in the
18 above-captioned matter for Proposed Intervenor-Defendant Alliance for Gun
19 Responsibility (“the Alliance”). I am over the age of eighteen, competent to testify,
20 and make this declaration based on my personal knowledge of the facts stated herein.

21 2. Attached as Exhibit A is a true and correct copy of the Declaration of
22 Renee Hopkins filed in *Guardian Arms LLC v. Inslee*, No. 23-2-00377-13 (Grant
24 Cnty. Super. Ct.).

25 I declare under penalty of perjury that the foregoing is true and correct.

1 EXECUTED this 11th day of May, 2023, at Seattle, Washington.

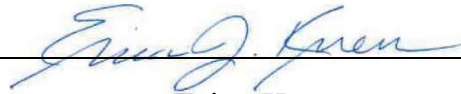
2 s/ Kai A. Smith

3 KAI A. SMITH, WSBA #54749

CERTIFICATE OF SERVICE

On the 11th day of May, 2023, I caused to be served, via ECF electronic service, a true copy of the foregoing Motion to Intervene upon all counsel registered for e-service.

DATED this 11th day of May, 2023.



Erica Knerr

EXHIBIT A

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

IN AND FOR THE COUNTY OF GRANT

GUARDIAN ARMS LLC, a Washington
limited liability company, *et al.*,

Petitioners,

v.

JAY INSLEE, in his official capacity as
Governor of Washington, *et al.*,

Respondents.

No. 23-2-00377-13

DECLARATION OF RENÉE
HOPKINS IN SUPPORT OF
ALLIANCE FOR GUN
RESPONSIBILITY'S MOTION TO
INTERVENE AS DEFENDANT

1 1. I am over the age of 18, am competent to testify, and offer this declaration based
2 on my personal knowledge.

3 2. I am the Chief Executive Officer of the Alliance for Gun Responsibility
4 (“Alliance”). The Alliance is a nonprofit organization based in Seattle, Washington, that is
5 dedicated to ending gun violence and promoting a culture of gun ownership that balances rights
6 with responsibilities. The Alliance collaborates with experts, civic leaders, and citizens at the local
7 and national level to identify and advocate for evidence-based solutions to the crisis of gun
8 violence. The Alliance then promotes those solutions at the local, regional, and state levels.

9 3. The Alliance has successfully led statewide coalitions to pass several landmark
10 ballot measures to improve Washington’s firearm laws. Those measures include Initiative Measure
11 594, which required background checks for all gun sales, closing a loophole that had allowed sales
12 by “private sellers” at gun shows, on the internet, and in other situations without background
13 checks. They also include Initiative Measure 1491, which allowed courts to issue Extreme Risk
14 Protections Orders (ERPOs) at the request of law-enforcement officers, family members, and
15 others to keep firearms out of the hands of someone deemed a danger to themselves or others. And
16 in 2018, the Alliance successfully led the campaign—through a political committee we
17 established, Safe Schools Safe Communities—for Initiative Measure 1639, which established
18 requirements for firearm safety training, adopted a 10-day waiting period to purchase a semi-
19 automatic assault rifles, and raised the age for purchase of semi-automatic assault rifles from 18
20 to 21.

21 4. The Alliance successfully intervened to defend the legality of both I-594 and I-
22 1639.

23 5. The Alliance has also worked with the Washington legislature to pass common-
24 sense firearms laws. For example, the Alliance spent over six years working to pass what became
25 Engrossed Senate Bill 5078 (“ESSB 5078”), a law regulating large-capacity magazines that was
26 signed into law on March 23, 2022 and went into effect on July 1, 2022. The Alliance has
27 intervened in two lawsuits challenging the legality of ESSB 5078. The same session, the Alliance

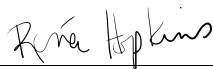
1 successfully advocated for five other vital gun violence prevention bills, including HB 1630
 2 (which prohibited open carry of firearms at public meetings of local government entities), and HB
 3 1705 (which restricted ghost guns—unserialized and untraceable firearms).

4 6. The Alliance also spent more than seven years working to enact the restrictions on
 5 assault weapons that ultimately were contained in Substitute House Bill 1240 (“SHB 1240”). The
 6 Alliance actively assisted in policy research and development, assisted in drafting proposed bill
 7 language, and recruited experts to provide analysis of and legislative testimony on the special
 8 dangers of assault weapons and the efficacy of restrictions on their sale and distribution.
 9 Furthermore, the Alliance was the primary organizer of public support for passage of SHB 1240,
 10 developing fact-sheets, policy analysis, and other advocacy content for its website, email lists,
 11 social media, and other forums for public engagement. Among other efforts, the Alliance
 12 coordinated thousands of advocates in support of the bill and tens of thousands of communications
 13 made directly to legislators. Alliance supporters were a major presence at the state capitol during
 14 the legislative session (easily recognizable in our orange t-shirts). The Alliance also organized
 15 testimony in support of SHB 1240 from numerous people with firsthand experience with gun
 16 violence, including survivors, health care providers, law enforcement officials, veterans, and
 17 educators. Alliance staff and board members also testified in support of the bill.

18 7. After more than seven years of investment and hard work, the Washington
 19 Legislature passed SHB 1240, and on April 25, 2023, Governor Jay Inslee signed the bill into
 20 law. I and other members of the Alliance were in attendance at the signing ceremony.

21 I declare under penalty of perjury that the foregoing is true and correct.

22 Executed on this 1st day of May, 2023.

23 
 24 _____
 25 Renée Hopkins, CEO
 26 Alliance for Gun Responsibility
 27

CERTIFICATE OF SERVICE

I certify that I filed with the Court and electronically served a copy of this document on all parties on the date below as follows:

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I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 1st day of May, 2023, at Seattle, Washington.

s/Erica Knerr
Erica Knerr, Legal Asst.